

Kennecott Barneys Canyon Mining Company  
P.O. Box 311  
8200 South 9600 West  
Bingham Canyon, Utah 84006-0311  
T 801-569-7000  
F 801-569-7190

Steve Schnoor  
Manager – Environment, Land and Energy  
July 27, 2015

Mr. Paul Baker, Minerals Program Manager  
Division of Oil, Gas & Mining  
Utah Department of Natural Resources  
1597 West North Temple, Suite 1210  
P.O. Box 145801  
Salt Lake City, UT 84114-5801

Paul Baker - DOGM


Leslie  
April  
Mike  
Peter

Subject: **Kennecott Barneys Canyon Mining Company Response to Amendment of Notice of Intention, Kennecott Barneys Canyon Mining Company, Barneys Canyon Mine, M/035/0009, Salt Lake County, Utah, dated June 10, 2015**

Dear Mr. Baker:

Please find this letter as the response to questions and comments outlined in your letter dated June 10, 2015 - *Amendment Notice of Intention, Kennecott Barneys Canyon Mining, Barneys Canyon Mine, M/035/0009, Salt Lake County, Utah*. Also please find attached the associated MR-REV form for inclusion of this response in the Barneys Canyon Mine Mining and Reclamation Plan. Should the Division have any questions regarding this submittal or require additional information during the review, please contact Trevor Heaton at 801.563.1514.

Regards,

  
Steve Schnoor  
Manager – Environment, Land and Energy  
Rio Tinto Kennecott  
For: Barneys Canyon Mining Company

cc: Leslie Heppler (UDOGM)  
Brian Hamos (UDWQ)  
Dan Hall (UDWQ)  
Doug Bacon (UDERR)

RECEIVED

JUL 27 2015

DIV. OF OIL, GAS & MINING



**Kennecott Barneys Canyon Mining Company Response to Amendment of Notice of Intention, Kennecott Barneys Canyon Mining Company, Barneys Canyon Mine, M/035/0009, Salt Lake County, Utah, dated June 10, 2015**

1. DOGM: (lah) Please resubmit the "Request for Approval to Construct" from DEQ after their requested changes have been made and the document is finalized with DEQ.

*Response: A copy of the approval to construct will be formally submitted to DOGM once we have received from DEQ.*

2. DOGM: (pnb) Briefly explain the source and use of the 300 ppm arsenic screening level, and the source and use of an apparent second screening level of 225 ppm arsenic (Figure 4-1).

*Response: The preliminary screening level of 300 ppm arsenic that was used during the characterization study at Barneys Canyon came from the agricultural/recreational/open space arsenic number mentioned in the South End ROD for the Herriman area. A screening level of 225 ppm arsenic was used for the XRF analysis to provide a factor of safety for the accuracy of in-situ readings. 225 ppm is 75% of 300 ppm. The screening level was used upon the assumption that the value would be conservative compared to the anticipated risk based proposed cleanup goals.*

3. DOGM: (pnb) Explain the omission of data from samples taken from between 6 and 18 inches. Page 4-1 indicates that, in general, the highest concentrations of arsenic indicated by the XRF screening were encountered within the upper 6 to 12 inches below the surface. Since the maximum arsenic results from the SPLP test would likely correspond to the maximum arsenic concentrations in soil, the SPLP results provided are likely not representative of the maximum arsenic (or other elemental) leachability of this material.

*Response: Response: All data associated with samples described in the Pad BC-05 Characterization Report is included in the report, no data has been omitted. Of the 90 samples collected during the site characterization 16 samples in the Pad 5 area were analyzed for SPLP and total arsenic. These samples represent the soils with the highest arsenic concentrations identified in the Pad 5 area.*

*Test pit sampling was conducted in accordance with the Characterization Work Plan, and as stated in Section 4.2 (page 4-1) of the Barneys Canyon Characterization Report – Leach Pad BC-05 Area. XRF screening was performed at the surface and at various depths to the bottom of each test pit. Using professional judgement, similar readings were compiled into zones corresponding to their depth, i.e. 6-12 inches, etc. Laboratory samples were collected at 10% of the test pits from the zone exhibiting the highest concentration of arsenic and submitted to the laboratory for total and SPLP analysis. Therefore, leachability results shown are from the sample containing the highest total concentration of arsenic. The project Scope of Work included the following sampling protocol:*

*'A vertical channel grab sample will be collected from the lens of soil containing the highest concentration of arsenic. This sample depth or interval will vary depending on location. A vertical channel grab sample will also be collected from the native underlying soil 4 inches below contact.'*



*As stated in the report, the highest concentration was generally encountered within the upper 6 to 12 inches below the surface. A second sample was collected from underlying material representing native, un-impacted soil. There were no samples collected between the two represented zones.*

4. DOGM: (mpb) On Sheet 5-DR-04, Channel Type B should specify that, in addition to a D50 of 12", only angular rock be used from stations 609+82.2 due to the steepness of this section. Nothing less angular than sub-angular should be specified in all other sections of the channel. A minimum stone density should also be specified.

*Response: This channel has been omitted from the design. The comment is noted and angular rock will be specified in future design drawings.*

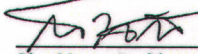


## Application for Mineral Mine Plan Revision or Amendment

<b>Operator:</b> Barneys Canyon Mining Company Inc.			
<b>Mine Name:</b> Barneys Canyon Mine			<b>File Number:</b> M/ 035 / 0009
Provide a detailed listing of all changes to the mining and reclamation plan that will be required as a result of this change. Individually list all maps and drawings that are to be added, replaced, or removed from the plan. Include changes of the table of contents, section of the plan, pages, or other information as needed to specifically locate, identify and revise or amend the existing Mining and Reclamation Plan. Include page, section and drawing numbers as part of the description.			
<b>DETAILED SCHEDULE OF CHANGES TO THE MINING AND RECLAMATION PLAN</b>			
			<b>DESCRIPTION OF MAP, TEXT, OR MATERIALS TO BE CHANGED</b>
<input checked="" type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Add the attached <i>Kennecott Barneys Canyon Mining Company Response to Amendment of Notice of Intention, Kennecott Barneys Canyon Mining Company, Barneys Canyon Mine, M/035/0009, Salt Lake County Utah, dated June 10 2015</i> to the back of the existing Appendix L (Division of Water Quality Correspondence) of the Kennecott Barneys Canyon Mine Mining and Reclamation Plan.
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	
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I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments and obligations, herein.

Trevor Heaton  
Print Name

 Reclamation Engineer  
Sign Name, Position  
7/21/2015  
Date

**Return to:**

State of Utah  
Department of Natural Resources  
Division of Oil, Gas and Mining  
1594 West North Temple, Suite 1210  
Box 145801  
Salt Lake City, Utah 84114-5801  
Phone: (801) 538-5291 Fax: (801) 359-3940

<b>FOR DOGM USE ONLY:</b>	
File #:	M/ <u>        </u> / <u>        </u>
Approved:	<u>                                </u>
Bond Adjustment: from (\$)	<u>                                </u>
to \$	<u>                                </u>